

DOCKET FILE COPY ORIGINAL

December 12, 1997

Elijah Mondy,
4200 W. 177th St.
Country Club Hills, IL 60478

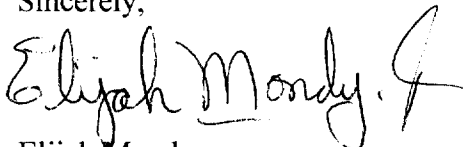
Federal Communications Commission
Office of the Secretary
1919 M. Street Room 222 N.W.
Washington, D.C. 20554

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To Whom It May Concern:

Enclosed are the original and four copies of Summary and Clarification regarding my comments on Notice of Proposed Rulemaking MM Docket No. 97-215 and RM-9168 to reallocate Channel 234A from Wilson, Arkansas to Turrell, Arkansas and modify the authorization for station KAFW (FM). These comments have been overnight expressed to insure getting to you by deadline date. If there are any questions, please call me at 708-957-5210. Thank you.

Sincerely,



Elijah Mondy,

No. of Copies rec'd 0+4
List ABCDE

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments,
FM Broadcast Stations.
(Wilson and Turrell, Arkansas)

MM Docket No. 97-215)
RM-9168

SUMMARY AND CLARIFICATION

Elijah Mondy, Jr.
Mondy-Burke Broadcasting
4200 W. 177th Street
Country Club Hills, IL 60 478
December 12, 1997

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This is a summary and clarification of my original comments regarding the Notice of Proposed Rulemaking (RM-9168) (MM Docket No. 97-215) adopted October 1, 1997 and released October 10, 1997 giving consideration and proposing to reallocate channel 234A from Wilson to Turrell, AR, and to modify the authorization for station KAFW-FM and my concern of this being an attempt by Pollack Broadcasting to do an "end-around" "slipping through the back door" tactic with the Commission. It is clear that while the Audio Services Division was insisting that Pollack commence building the FM at Wilson, Arkansas, Pollack was going to another branch of the FCC to get the authorization changed from Wilson to Turrell, Arkansas a city approximately 15 miles or so from Memphis, TN. The argument by Pollack that station KAFW-FM is an unbuilt facility and no loss of existing service will result to Wilson from its reallocation proposal is mute because it will amount to a loss of "an opportunity" to the community of Wilson.

Because of its close proximity, Turrell is almost like a suburb of Memphis, TN and most of the television and radio signals out of Memphis, TN and West Memphis, AR are dominant in Turrell. Much of the area weather and certain happenings pertaining to Turrell would be included in certain broadcasts. Building this station in Turrell would make it a stronger part of the Memphis market rather than Wilson which is further away, making this "slipping through the back door" strategy of Pollack broadcasting a clever attempt if the Commission allows this.

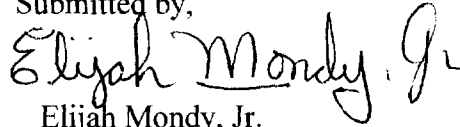
The problem is that Wilson Arkansas would be deprived of its' FM allotment which would be superior to KOSE-AM whether or not it is now licensed to Osceola or Wilson. It is obvious that FM is more attractive than AM. Why should Wilson now lose its' FM allotment? The initial machinery and scarce resources, time and effort of the Commission and justifications to give Wilson its' FM allotment would simply amount to a waste if it is now taken from the community of Wilson and given to a city closer to Memphis.

Also, this process has already taken too long and the concerns of the Audio Services Division of the Commission concerning this and its reprimands and authority would be undermined. Individuals in the community of Turrell or the Memphis market or anywhere else would be deprived of the opportunity of competing for what would be a new allotment at Turrell if this "coming through the back door" strategy is allowed.

The Audio Services Division has insisted that construction of this allotment at Wilson commence immediately and had requested certification of this from Pollack. Pollack would not do so because it was doing an "end around" and coming through the back door to get this allotment moved to the city of Turrell which, of course, is much closer to Memphis. On November 26, 1996, Mr. Dennis Williams and the Audio Services Division in a footnote on page 3 of its return and dismissal of Pollack's application BMPH-951103IC warned them by saying "furthermore, it is our understanding that such petitions have been rejected twice by the Policy and Rules Division".

Therefore, in conclusion, the Commission should allow the allotment of Channel 234A at Wilson to stand.

Submitted by,

A handwritten signature in cursive script that reads "Elijah Mondy, Jr.".

Elijah Mondy, Jr.

Mondy-Burke Broadcasting

4200 W. 177th Street

Country Club Hills, IL 60478

cc Barry D. Wood

Wood & Brinton, Chartered